

Exhibit List

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CIVIL DIVISION

CASE NO. 9:24-80920-CIV-CANNON

JEFFREY BUONGIORNO,

Plaintiff,

v.

ALEJANDRO MAYORKAS, ET AL

Defendant.

EXHIBIT LIST

By stating specific objections to exhibits, the parties do not alleviate their responsibility to introduce and meet admissibility requirements with respect to any exhibit. The parties may abbreviate objections as needed. The number in the "Exhibit Number" column must indicate the pre-marked identification label (*e.g.*, P-1 or D-1).¹

| Exhibit Number | Description | Bates Range / Other Source | Objections and Reasons | Date Identified | Date Admitted |
|----------------|---|----------------------------|------------------------|-----------------|---------------|
| NOTE | P1 to P4 Left Blank Intentionally to accommodate a prior filing. | | | | |
| P5 | Canvassing Board Meeting minutes of August 9 th , 2024 | PAGE_0001-PAGE_0002 | | | |
| P6 | Public Records Request #23-92. Time Stomped with 9/13/1984 date. | PAGE_0001-PAGE_0002 | | | |
| P7 | DS-DE 40 Form version 2/2024. Page 0001 1 is Excel | PAGE_0001-PAGE_0002 | | | |

¹ The Plaintiffs' exhibits must be marked numerically with the letter "P" as a prefix; the Defendants' exhibits must be marked numerically with the letter "D" as a prefix.

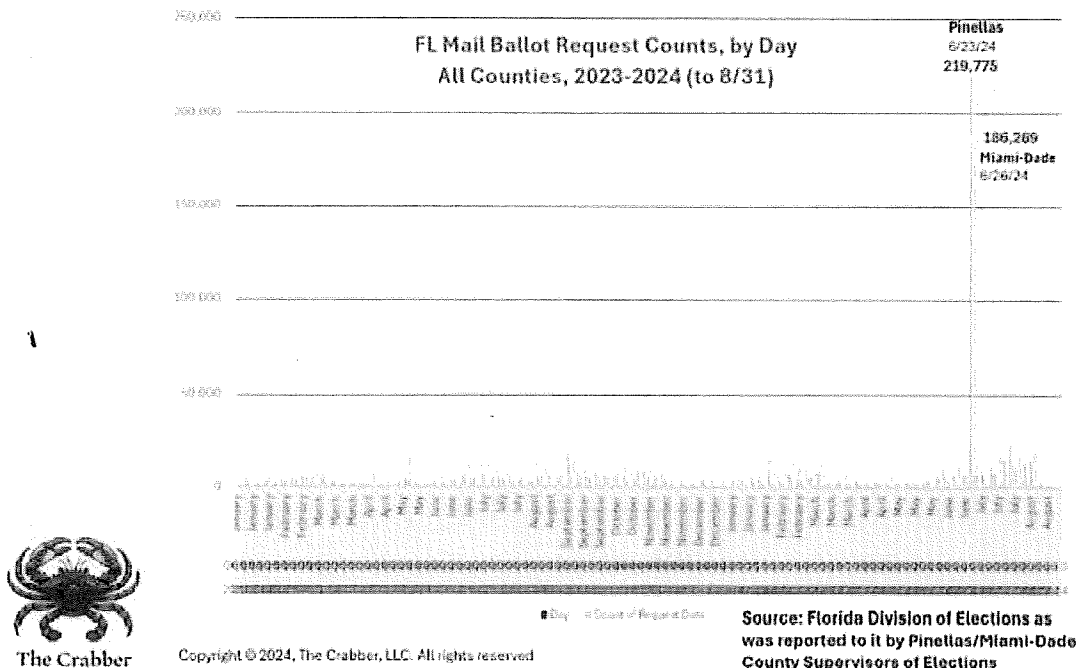
| Exhibit Number | Description | Bates Range / Other Source | Objections and Reasons | Date Identified | Date Admitted |
|----------------|---|----------------------------|------------------------|-----------------|---------------|
| P8 | format and Page 0002 is .PDF DS-DE 40 used in 2020 Election | PAGE_0001-PAGE_0002 | | | |
| P9 | Canvassing Board meeting minutes from 9/25/2024 | PAGE_001-PAGE_0003 | | | |
| P10 | EL52 Report for Nov 8, 2022 Election (59 Blank Ballots cast) PALM BEACH | PAGE-0001 | | | |
| P11 | EL52 Report for NOV 3, 2020 (20,313 Blank Ballots cast) PALM BEACH | PAGE-0001 | | | |
| P12 | EL 52 Report, NOV 8, 2020. Broward County (60,165 Blank Ballots cast) | PAGE-0001 | | | |
| P13 | Witness Affidavit Chris Gleason Attesting to Public Records altering | PAGE_0001-PAGE_0005 | | | |
| P14 | 9/26 Email from Supervisor Link stating she is not a member of the canvassing board | PAGE_0001 | | | |
| P15 | VR Terms & Conditions, not liable for protection of data | PAGE_0001 | | | |
| P16 | ElectionsFL.org threat assessment report | PAGE_001-PAGE-PAGE-011 | | | |
| P17 | VRSystems.com threat assessment Report | PAGE_001-PAGE_048 | | | |
| P18 | Vr Systems Memo regarding Outage on 8.20.24 | PAGE_001 | | | |
| P19 | Records Request 24-1075 | PAGE 001-PAGE 002 | | | |
| P20 | Attorney letter re: contesting Digital Signatures | PAGE_001 | | | |
| P21 | Affidavit from John W. Liccione | PAGE_001-PAGE_0004 | | | |
| | | | | | |

AFFIDAVIT OF JOHN WILLIAM LICCIONE

I, John W. Liccione, on this 2nd day of October, 2024, do hereby solemnly swear under penalty of perjury that the facts and allegations and informed opinions as stated herein are true and accurate to the best of my knowledge.

1. I was recently a Democratic candidate for Congress in Pinellas County's CD-13 in the August 20th primary election.
2. I was one of 5 democrats running in the primary.
3. I have filed a lawsuit against Pinellas County Supervisor of Elections Julie Marcus and Pinellas Democratic Party chair Jennifer Griffith and others alleging mail-ballot fraud and other wrongful acts in the US District Court of the Middle District of Florida. (Case no. 8:24-cv-02005-SDM-NHA). This case has been moved to the IDEAS track and has been assigned to a magistrate judge and is awaiting a case management conference which will be held in the next two weeks.
4. I have filed a second mail-ballot fraud lawsuit against Julie Marcus, Jennifer Griffith and others in the Florida 6th Circuit Court in Pinellas County. (Case No. 24-003939-CI).
5. On August 17th, I received a communique from an individual via my RussiLeaks media company website alleging that she and others had been paid to mark blank ballots on behalf of my Democratic opponents. She claimed that she was willing to come forward and testify if she could keep the money she was paid. She also claimed that she had witness my female and male opponents entering the building in which the mail ballots were being marked by her and others. She used the code name "Tampa Girl" in her communique.
6. My opponent Whitney Fox won the primary by 44 points. I came in last with only 3.8 percent of the vote. The vast majority of votes were vote-by-mail ballots cast for Whitney Fox.
7. Based on State-produced vote-by-mail ballot request data in my possession, there was an anomalous huge singular spike in mail ballot requests received and reported by the Pinellas Supervisor of Elections (PSOE) through their contractor VR Systems, on a single Sunday: 219,775.
8. Further, just three days later, there was a similar huge anomalous spike in mail ballot requests in Miami-Dade County: 186,289.
9. I am the founder and CEO of The Crabber News, LLC, a newly formed Florida newspaper.

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10. On August 30, 2024, in my role as CEO of The Crabber News, I submitted a public records request to the PSOE requesting a list of the source IP addresses of the 219K+ mail ballot requests received on the date of July 23, 2024. I specifically asked only for the IP addresses and the timestamps of the request submittals. I did not request the names of the voters or other personally identifiable information.
 11. On September 17th, Matt Smith, General Counsel of the PSOE, responded to my request claiming that: *"We have no records responsive to your request."*
 12. From the State mail ballot request files, I created the below Crabber Chart depicting the two massive spikes as compared to every other day, in every county in Florida, since January of 2023.
 13. On September 24th, I broke the news on The Crabber News website in an expose' entitled: *"Mail Ballot Supply Chain Vulnerability Exposed in Pinellas County"*. The article was subtitled: *"Elections office claims no source IP address records exist for 219K mail-in ballot requests submitted on Sunday, June 23rd"* (<https://thecrabber.com/f/mail-in-ballot-supply-chain-hack-exposed-in-pinellas-county>.)
 14. Within the article, I published the below Crabber Chart showing the two massive spikes in Pinellas and Miami-Dade Counties as compared with all other counties as to mail-in ballot request counts and dates.



15. Based on an investigation of the published user's "help" manual on VR Systems website, their software, called VR Focus, which is used by most counties in Florida to record and fulfill (or reject as fraudulent or otherwise) mail ballot requests is

captured by VR Focus at the time of submittal, contains the source IP addresses used by requestors of mail ballots.

16. In addition, within VR Focus, there is a Fraud Detection feature which includes a Fraud Detection Case management system which automatically detects suspicious activity in mail ballot requests, logs the IP address and/or email address of the requestor, and alerts election workers and VR Systems employees that, for example, that a single IP address has requested mail ballots or changes in voter data 89 times, and that a fraud detection case number is automatically assigned to it for follow-up investigation.
17. There is a picture of the Fraud Detection Case management feature showing the IP address and/or the email address of mail-ballot requestors in VR Systems on-line user's manual still accessible over the Internet.
18. In my expert opinion as a cybersecurity executive with over 25 years' experience in information technology, networking, software, and cyber-security best practices, Matt Smith's assertion that the PSOE has no records of the IP addresses of submitters of mail ballot requests is either: (1) A fraudulent misrepresentation; or, (2) he is telling the truth as he knows it and some malicious actor, as yet unidentified, has hacked VR Systems and has wiped the records of the IP addresses used by mail ballot requests from June 23rd and 26th, 2024.
19. Based on (1) the State's mail ballot request data published to candidates in the 2024 August 20th primary election; (2) the publicly viewable Voter Focus software user's manual showing VR Systems' Voter Focus software does in fact record the source IP addresses of mail-ballot requestors and that there is a fraud detection feature which one would presume would flag as potential fraud the submission of over 219K ballot requests on a single Sunday; and (3), based on Matt Smith's representation that no such IP address records even exist in the PSOE's possession (or in the possession of their contractor VR Systems), that mail ballot request election fraud has occurred on a massive scale, at least, in the two most populous counties in Florida.
20. As such, I firmly believe that as a matter of national security, it is imperative that the Court intervene immediately and compel the SOEs in Pinellas and Miami-Dade Counties, and in any other affected Florida counties, to provide an explanation for the June 23rd and June 26th anomalies, and to produce all the IP address records for mail-ballot requestors from June 23rd and June 26th in Pinellas and Miami-Dade Counties, and in Broward and Palm Beach Counties.

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21. Because almost every county in Florida contracts with VR Systems as a cloud service provider to process these mail ballot requests, data which is synch-ed to the State and Counties over the Internet or otherwise, the scope of this potential mail ballot fraud covers most of Florida, and potentially affects all other states in the nation currently contracting with VR Systems for the same services.
 22. This makes this matter a federal matter, and a matter of national security, not just a Florida State matter, to ensure the integrity of the upcoming September 6th General Election.



John W Liccione

October 2, 2024

NOTARY ACKNOWLEDGMENT

State of Florida

County of Pinellas

On this 2nd day of October, 2024, before me, the undersigned Notary Public, personally appeared John W Liccione, who is:

- personally known to me OR
- has produced FL Driver License (type of identification) as identification,

and who did take an oath, and acknowledged that he/she executed the foregoing instrument for the purposes therein contained.

Signature of Notary Public:


(Name of Notary Public)

Printed Name of Notary Public:

Samantha Bugatch

Commission Number:

HH 527108

My Commission Expires:

06/26/2028

Notary Stamp or Seal:

